

EXHIBIT F

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7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE WESTERN DISTRICT OF WASHINGTON**

9 UNIVERSAL LIFE CHURCH
10 MONASTERY STOREHOUSE, a
Washington non-profit corporation,

11 Plaintiff,

12 vs.

13 MAURICE KING, LEWIS KING, GLEN
14 YOSHIOKA, DYLAN WALL, SARA
15 WHITE, and AMERICAN MARRIAGE
MINISTRIES, a Washington non-profit
corporation,

16 Defendants.

No. 2:19-CV-00301-RSL

AMENDED
NOTICE OF DEPOSITION

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18 **TO: DEFENDANT AMERICAN MARRIAGE MINISTRIES**

19 **DATE: March 23, 2020**

20 **TIME: 8:30 am**

21 **PLACE: 411 University Street, 12th Floor Business Center, Seattle, WA 98101**

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23 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that pursuant to
24 Fed.R.Civ.Pro 30(b)(6) Plaintiff Universal Life Church Monastery Storehouse will take
25 the deposition upon oral examination of Defendant American Marriage Ministries through
26 its identified and designated agent(s), under oath before a Notary Public or such person as
27 authorized to administer oaths, with said testimony to be transcribed by court reporter, at
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1 the date, time, and place indicated above, with said oral examination to be subject to
2 continuance or adjournment from time to time or place to place until completed.

3 For said deposition, Defendant American Marriage shall designate one or more
4 officers, directors, managing agents, or other persons who consent to testify on its behalf
5 as to the matters following designated matters:

6 **1.** Your knowledge and awareness of Plaintiff, Plaintiff's status as a corporate
7 entity, and any relationship, affiliation, or lack thereof between Plaintiff and Universal Life
8 Church, Inc. or any other "Universal Life Church" entity based in California, including when
9 and how You obtained such knowledge or awareness.

10 **2.** The "preparing, reviewing, and approving [of] the content" of the AMM-v-
11 ULC website, including the identity of each individual involved and the nature of such
12 individual's involvement

13 **3.** The "preparing, reviewing, and approving [of] the content" of the AMM Legal
14 website, including the identity of each individual involved and the nature of such individual's
15 involvement.

16 **4.** The basis for Your statement "There are two major organizations when it
17 comes to online ordination, American Marriage Ministries (AMM) and the Universal Life
18 Church Monastery (ULC Monastery)," including any investigation conducted by You into
19 the veracity of this statement and any metric used to determine the existence of "two major
20 organizations."

21 **5.** The basis for Your statement "AMM and the ULC Monastery are the two most
22 established options," including any investigation conducted by You into the veracity of this
23 statement and any metric used to determine "the two most established options."

24 **6.** The basis for Your statement "[s]ince AMM and the ULC Monastery are the
25 *two most established options*, we've created a side-by-side comparison to help," including
26 which "side-by-side comparison" this statement refers to.
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1 **7.** Any factual support or reason to believe that Plaintiff “had had [its] IRS non-
2 profit status revoked.”

3 **8.** Any factual support or reason to believe Plaintiff “has been embroiled in fraud
4 allegations.”

5 **9.** Any factual support or reason to believe Plaintiff “has been in and out of
6 bankruptcy.”

7 **10.** The bases for Your statement there are “dozens of rulings against the Universal
8 Life Church for tax fraud, denial of validity of ULC ordinations, and millions of dollars in
9 fines levied against the Universal Life Church.”

10 **11.** Any factual support or reason to believe there are “dozens of rulings against
11 [Plaintiff] for tax fraud, denial of Validity of [Plaintiff’s] ordinations, and millions of dollars
12 in fines levied against [Plaintiff],” including any investigation conducted by You into the
13 veracity of such claim.

14 **12.** The basis for Your statement “the Universal Life Church [has] hundreds of
15 offshoots.”

16 **13.** Any factual support or reason to believe Plaintiff has “hundreds of offshoots.”

17 **14.** The basis for Your statement “to the best of our knowledge the federal
18 government does not recognize the ULC Monastery as a 501c3 church,” including any
19 investigation conducted by You into the veracity of such claim.

20 **15.** The basis for Your statement “the federal government recognizes AMM as a
21 501(c)(3) tax exempt church.”

22 **16.** The basis for Your statement “American Marriage Ministries...is a Federally
23 Recognized 501c3 Charitable Organization.”

24 **17.** The basis for Your statement AMM is an “IRS 501c3 Certified Non-Profit
25 Ministry.”
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1 **18.** The basis for Your statement, “AMM is a federally recognized 501c(3)
2 charitable organization.”

3 **19.** The basis for Your statement, “The Universal Life Church (Monastery) has not
4 been approved by the Internal Revenue Service as a tax-exempt, charitable organization with
5 501c(3) recognition,” including any investigation conducted by You into the veracity of this
6 claim.

7 **20.** The basis for Your statement the AMM-v-ULC “website is run by ministers
8 that are affiliated with American Marriage Ministries.”

9 **21.** The basis for Your statement the AMM Legal Website “is run by ministers that
10 are affiliated with American Marriage Ministries.”

11 **22.** The factual support for Your statement “American Marriage Ministries has
12 worked with the Clark County Clerk’s Office for years, and AMM ministers perform
13 marriages in Las Vegas every day.”

14 **23.** The factual support for Your statement, “AMM appears” on “Clark County’s
15 official list of recognized churches.”

16 **24.** Your theological doctrine.

17 **25.** The dates of Your registration and control of the domain
18 “americanmarriageministries.com” and the manner in which You used the
19 americanmarriageministries.com, including any content published via such domain name.

20 **26.** Your past and present policies and procedures regarding management,
21 registration, and renewing registrations for domains You have registered or control.

22 **27.** When and how You first learned that someone other than You had owned,
23 controlled, or registered the domain “americanmarriageministries.com.”

24 **28.** Any actions You undertook to determine or identify the registrant or operator of
25 the americanmarriageministries.com domain name or associated website, the dates of such
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1 actions, the identity of all individuals involved in such actions, and the nature of such
2 individuals' involvement.

3 **29.** Any actions You undertook to monitor the content or use of the
4 americanmarriageministries.com domain name or associated website, the dates of such
5 actions, the identity of all individuals involved in such actions, and the nature of such
6 individuals' involvement.

7 **30.** Any actions You undertook to stop, deter, or obtain some remedy for the
8 actions underlying Your counterclaims against Plaintiff, the dates of such actions, the identity
9 of all individuals involved in such actions, and the nature of such individuals' involvement.

10 **31.** Your past and present decisions to, or not to, address or take action against any
11 of Plaintiff's alleged actions underlying Your claims against Plaintiff, the dates of such
12 decisions, the basis and rationale for such decisions, the identity of all individuals involved in
13 such decisions, and the nature of such individuals' involvement.

14 **32.** When and how You first learned any facts to support Your contention that on or
15 about May 22, 2013, the americanmarriageministries.com website redirected visitors to one
16 of Plaintiff's websites, specifically, <https://www.themonastery.org>.

17 **33.** When and how You first learned any facts to support Your contention that on or
18 about May 17, 2014, the website at americanmarriageministries.com stated "Welcome to the
19 American Marriage Ministries, a proud affiliate of the Universal Life Church."

20 **34.** When and how You first learned any facts to support Your contention that on
21 November 17, 2014, the website at "americanmarriageministries.com" stated "Legally
22 Invalid American Marriage Ministries Ordination," and "This webpage exists to inform
23 would-be ministers that ordinations performed by the American Marriage Ministries...are
24 NOT considered legally valid."

25 **35.** When and how You first learned any facts to support Your contention that on
26 November 26, 2018, and for at least the two years prior, the website at
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1 “americanmarriageministries.com” stated “American Marriage Ministries ordinations...may
2 not enable would-be ministers to perform legally recognized marriages.”

3 **36.** The basis and support for Your contention “AMERICAN MARRIAGE
4 MINISTRIES has come to be associated with the services provided by AMM,” including
5 Your claim of acquired distinctiveness under Section 2(f) of the Lanham Act and any
6 evidence related to such distinctiveness.

7 **37.** Your application to federally register the words “AMERICAN MARRIAGE
8 MINISTRIES” as a trademark, including all filings and statements communicated to the U.S.
9 Patent & Trademark Office in support thereof.

10 **38.** Your disclaimer of any exclusive rights to the words “marriage ministries”
11 apart from the claimed trademark “AMERICAN MARRIAGE MINISTRIES.”

12 **39.** Your knowledge of the “memorandum order issued by Senior Judge Curtis E.
13 von Kann of the D.C. Superior Court dated May 25, 2012” and Your contention the
14 “memorandum order” is “now moot.”

15 **40.** The bases for Your denial of Requests for Admission 16 through 19.

16 **41.** The basis for Your contention “AMM ministers are authorized to perform
17 marriages in all 50 states,” including any investigation by You regarding the veracity of this
18 contention.

19 **42.** The damages You are seeking, including the components thereof and how each
20 component was calculated or derived.

21 **43.** The facts and support for Your statement You “have been injured
22 reputationally,” by Plaintiff’s alleged actions as well as how You ascertained and measured
23 such injury.

24 **44.** All “lost business” You contend You lost as a result of Plaintiff’s alleged
25 actions, as well as how You ascertained and measured such lost business.
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1 **45.** Your policies, practices, and procedures as to the creating and maintaining
2 accounting and financial records, and what records and documents are created and
3 maintained.

4 **46.** The support and basis for Your contention that “prospective customers may be
5 dissuaded by [Plaintiff’s] statement about AMM...from using AMM’s services,” Including
6 any investigation by You into the veracity of such contention.

7 **47.** Your past and present policies, procedures, practices, and abilities to track or
8 identify the visitors to Your websites, including the number of such visitors, the sources and
9 channels through which such visitors visited Your websites, and the activity of such visitors
10 on Your websites, and including the identity of each individual involved in such tracking and
11 identification and the nature of such individual’s involvement

12 **48.** Your past and present policies, procedures, practices, and abilities to track or
13 identify the number of ministers or officiants ordained by You, including the identity of each
14 individual involved in such tracking and identification and the nature of such individual’s
15 involvement.

16 **49.** Any evaluations, studies, surveys, or analyses You performed, or which You
17 are aware of, as to whether any individual was, or could have been or could be, deceived,
18 confused, or misled by any statement You attribute to ULC Monastery.

19 **50.** All efforts by AMM Directors and personnel after July 3, 2019 to locate and
20 identify documents potentially responsive to Plaintiff’s First Interrogatories and Requests for
21 Production.

22 **51.** Any terms, words, or phrases used or understood by Your or the general public
23 to refer to AMM.
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26 **Definitions:**

27 **A.** The term "You" or "Your" as used herein refers to Defendant American
28 Marriage Ministries responding to these requests, including all of its agencies and sub-

1 agencies, departments and sub-departments, employees, agents, servants, accountants,
2 officers, directors, principals, and partners (whether general, limited, or otherwise).

3 B. "The AMM-vs-ULC Website" means and refers to the website with the domain
4 <https://amm-vs-ulc.com>.

5 C. "The AMM Legal Website" means and refers to the website with the domain
6 <https://americanmarriageministrieslegal.com>.

7 D. "AMERICAN MARRIAGE MINISTRIES Mark" means and refers to the
8 term "AMERICAN MARRIAGE MINISTRIES" in standard characters, as set forth in the
9 U.S. Trademark Registration 4,887,624.

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12 DATED this 12th day of March 2020.

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